

# **EXHIBIT A**

**BAUM SIGMAN AUERBACH & NEUMAN, LTD.**

Attorneys and Counsellors

200 West Adams Street, Suite 2200

Chicago, IL 60606-5231

312.236.4316

Fax 312.236.0241

**Deborah A. Farrell**

Legal Assistant

February 19, 2008

E-mail Address:

dfarrell@baumsigman.com

VTs Investigations, LLC

P.O. Box 971

Elgin, IL 60121-0971

Re: William E. Dugan, *et al.*  
v. Mahoney & Associates, L.L.C.  
Civil Action No. 08 C 1011  
Our File No. 20785

Dear Sir/Madam:

Enclosed please find the original and one copy of the Summons and one copy of the Complaint in the above-captioned matter. Please serve the copy of the Summons and Complaint on **CLINTON MAHONEY, Registered Agent/Manager**, at one of the following addresses:

237 E. Ontario  
Chicago, IL 60611

or

11405 Burr Oak Lane  
Burr Ridge, IL 60527

After service has been effected, please complete an Affidavit of Service and return the original Summons to our office.

If you have any questions, please contact me.

Sincerely,

**BAUM SIGMAN AUERBACH & NEUMAN, LTD.**



Deborah A. Farrell  
Legal Assistant

/daf

Enclosures

cc: David S. Bodley  
Ron Selby, Jr.

\\AMOEJ\Mahoney & Associates\vtS 02-19-08.daf.wpd

## **EXHIBIT B**

**Date:** Mon, 17 Mar 2008 08:45:01 -0500  
**From:** DEB (Farrell, Deborah A.)  
**To:** "Sue Turner" <suet@pichicago.com>  
**Reply-to:** dfarrell@baumsigman.com  
**Subject:** bcc: re: Mahoney & Associates

I have another business address of: 12736 S. Ridgeway Avenue, Alsip, IL 60803-1533, 708-293-0110. Lets try this.

On Friday, March 14, 2008 4:41 PM, Sue Turner wrote:

**Date:** Fri, 14 Mar 2008 16:41:40 -0500  
**From:** Sue Turner  
**To:** "Debbie Farrell"  
**Subject:** Mahoney & Associates

We are attempting service on Clinton Mahoney both at the residence and the business. We spoke with his mother at the address in Burr Ridge. She stated that he moved out and she had no forwarding info. We attempted at the business where we spoke with his father (Jim) stated that he was not authorized to accept service and he was very uncooperative. The business located on Ontario is called The Film Tape Works Studio. Do you want us to serve his father at the business address?

Sue Erickson VTS Investigations, LLC  
847/888-4464 Office 847/888-8588 Fax  
suet@pichicago.com <<http://www.pichicago.com/>>  
IL License:117-000192 122-000214  
Serving the Chicago Metro Area Since 1980

<<...>>

## **EXHIBIT C**

**Date:** Wed, 26 Mar 2008 13:41:31 -0500  
**From:** DEB (Farrell, Deborah A.)  
**To:** "Sue Turner" <suet@pichicago.com>  
**cc:** CMC  
**Reply-to:** dfarrell@baumsigman.com  
**Subject:** bcc: re: Clinton Mahoney

This guy is starting to bug me! Try this residential address:

10809 Chaucer Drive  
Willow Springs, IL 60480-1148

I think the wife's name is Dania. I don't think she holds any position with the company, but she can be served at the residence.

On Wednesday, March 26, 2008 10:56 AM, Sue Turner wrote:

**Date:** Wed, 26 Mar 2008 10:56:54 -0500  
**From:** Sue Turner  
**To:**  
**Subject:** Clinton Mahoney

We attempted to serve Clinton Mahoney at the address given in Alsip. This was the business address but they have moved out. There was a sign on the door saying that all deliveries are to be left downstairs. Leroy went downstairs and spoke with a separate company who stated that the company is no longer at this location but asked them to accept any packages for them. They do not know where Mahoney is now located. Do you have another address that you would like for us to attempt?

Sue Erickson VTS Investigations, LLC  
847/888-4464 Office 847/888-8588 Fax  
suet@pichicago.com <<http://www.pichicago.com/>>  
IL License: 117-000192 122-000214  
Serving the Chicago Metro Area Since 1980

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## **EXHIBIT D**

Return-Path: <suet@pichicago.com>  
From: "Sue Turner" <suet@pichicago.com>  
To: "Debbie Farrell" <dfarrell@baumsigman.com>  
Subject: Mahoney & Assoc.  
Date: Tue, 22 Apr 2008 11:09:27 -0500  
Organization: VTS Investigations  
Thread-Index: Acikkz1r6fme9B5tQOmfAGandRNd5w==

Debbie

We attempted to serve Clinton Mahoney and/or his wife Dania at the residence in Willow Springs. He is clearly avoiding service by not answering the door. Do you want us to set up surveillance and try to get him that way?

Sue Erickson VTS Investigations, LLC  
847/888-4464 Office 847/888-8588 Fax  
suet@pichicago.com <<http://www.pichicago.com/>>  
IL License: 117-000192 122-000214  
Serving the Chicago Metro Area Since 1980

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## **EXHIBIT E**

State of Illinois

General No.: 08C1011

County of USDC CHICAGO

**AFFIDAVIT OF SERVICE**

I, DEBORAH BRODLO, being first duly sworn on oath, depose and says that he/she is licensed or registered as a private detective under the Private Detective Security Act of 1993 or appointed as a Special Process Server and service was not completed on Mahoney & Associates, LLC, c/o Clinton Mahoney due to the following reason(s):

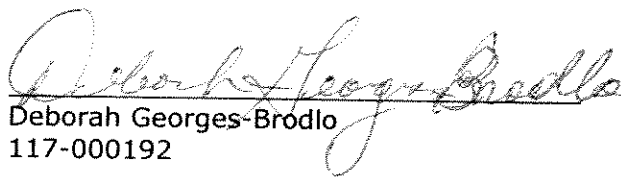
- |   |   |
|---|---|
| <ul style="list-style-type: none"><li>1. Moved</li><li>2. Occupant _____ knows<br/>but claims subject does not reside at address given.</li><li>3. Not known at address given by current occupant.</li><li>4. No such address found.</li><li>5. Need apartment or suite number.</li><li>6. Address vacant or out of business.</li><li>7. No longer employed at this location.</li><li>8. Rarely in office. Need residence for service.</li><li>9. Mail Drop or Private Mail Box business.</li><li>10. Deceased, hospitalized or incarcerated.</li><li>11. Other.</li><li>12. Security denies access to residence or office.</li><li>13. Appears home but refuses to answer door.</li><li>14. No Longer Corporate Agent.</li></ul> | <ul style="list-style-type: none"><li>15. Claims not the correct party. Refuses name or ID.</li><li>16. Return date expired. Reissue and return.</li><li>17. Appears home but refuses to answer door.</li><li>18. Appears avoiding service. See details below.</li><li>19. Return date expired. Reissue and return.</li><li>20. Returned by request or return date too short.</li><li>21. Numerous attempts - <b>NO CONTACT</b></li></ul> <p><b>Date</b> 3/12/2008    <b>Time</b> 4:30 PM</p> |
|---|---|

Additional or Other Information:

Unable to make personal contact at 237 E. Ontario, Chicago, IL. Spoke with defendant's father who refused to accept service. The company at this location is "The Film Tape Works Studio."

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to such matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

4-30-08  
Dated

  
Deborah Georges-Brodlo  
117-000192

State of Illinois

General No.: 08C1011

County of USDC CHICAGO

**AFFIDAVIT OF SERVICE**

I, LEROY KARCZEWSKI, being first duly sworn on oath, depose and says that he/she is licensed or registered as a private detective under the Private Detective Security Act of 1993 or appointed as a Special Process Server and service was not completed on Mahoney & Associates, LLC, c/o Clinton Mahoney due to the following reason(s):

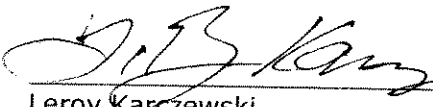
- |   |   |
|---|---|
| 1. Moved  | 15. Claims not the correct party. Refuses name or ID. |
| 2. Occupant _____ knows<br>but claims subject does not reside at address given. | 16. Return date expired. Reissue and return.          |
| 3. Not known at address given by current occupant.                              | 17. Appears home but refuses to answer door.          |
| 4. No such address found.   | 18. Appears avoiding service. See details below.      |
| 5. Need apartment or suite number.  | 19. Return date expired. Reissue and return.          |
| 6. Address vacant or out of business.   | 20. Returned by request or return date too short.     |
| 7. No longer employed at this location.   | 21. Numerous attempts - <b>NO CONTACT</b>             |
| 8. Rarely in office. Need residence for service.                                | <b>Date</b> 3/5/2008 <b>Time</b> 1:25 PM              |
| 9. Mail Drop or Private Mail Box business.                                      | <b>Date</b> 3/8/2008 <b>Time</b> 8:00 AM              |
| 10. Deceased, hospitalized or incarcerated.                                     | <b>Date</b> 3/24/2008 <b>Time</b> 8:25 PM             |
| 11. Other.  | <b>Date</b> 3/25/2008 <b>Time</b> 2:20 PM             |
| 12. Security denies access to residence or office.                              | <b>Date</b> 3/31/2008 <b>Time</b> 9:10 AM             |
| 13. Appears home but refuses to answer door.                                    | <b>Date</b> 4/5/2008 <b>Time</b> 1:10 PM              |
| 14. No Longer Corporate Agent.  | <b>Date</b> 4/6/2008 <b>Time</b> 10:30 AM             |
|   | <b>Date</b> 4/14/2008 <b>Time</b> 7:45 PM             |

## Additional or Other Information:

Defendant does not reside at 11405 Burr Oak Dr., Burr Ridge, IL. This is his mother house, refused information. Defendant no longer located at 12736 S. Ridgeway Ave., Alsip, IL. Defendant avoiding service at 10809 Chaucer Dr., Willow Springs,

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to such matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

4-30-08  
Dated

  
Leroy Karczewski  
117-000192

## **EXHIBIT F**

**BAUM SIGMAN AUERBACH & NEUMAN, LTD.**  
Attorneys and Counsellors

200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
312.236.4316  
Fax 312.236.0241

May 2, 2008

Catherine M. Chapman

E-mail Address:  
cchapman@baumsigman.com

Mr. Ron Selby, Jr.  
Delinquency Department Manager  
Midwest Operating Engineers  
Fringe Benefit Funds  
6150 Joliet Road  
Countryside, IL 60525-3994

Re: William E. Dugan, *et al.* vs. Mahoney & Associates, L.L.C.  
Civil Action No.: 08 C 1011  
Our File No.: 20785

Dear Ron:

Pursuant to your request, enclosed please find the original and one copy of the Summons, and one copy of the Complaint in the above-captioned matter. Please serve the copy of the Summons and Complaint on **CLINTON MAHONEY, Registered Agent/Manager**, at the following residential address: 10809 Chaucer Drive, Willow Springs, Illinois 60480-1148.

Please remind the individual who serves these documents to complete the information on the reverse side of the Summons, including the name of the person with whom the Summons and Complaint were left and, if possible, a description of the person. Ideally, the Summons and Complaint will be served on Clinton Mahoney himself.

I will contact you in approximately two weeks to confirm whether your office was successful in serving Mr. Mahoney through representatives of the Fund. If not, please have the individual who attempts to serve the Summons and Complaint record each date and time upon which attempts to serve the Summons and Complaint were made. I will then request that the Court allow us to post the Summons at his residential home address.

If you have any questions or would like to discuss this matter further, please feel free to contact me.

Sincerely,

**BAUM SIGMAN AUERBACH & NEUMAN, LTD.**



Catherine M. Chapman

CMC/j

Enclosures

E:\MOE\Mahoney & Associates\selby 05-01-08.cmc.j.wpd

cc: David S. Bodley